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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

PHILLIP RACIES, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

vs.

QUINCY BIOSCIENCE, LLC, a  
Wisconsin limited liability company,

Defendant.

Case No. 4:15-cv-00292-HSG

**STIPULATION REGARDING  
VOLUNTARY DISMISSAL OF  
PLAINTIFF'S INDIVIDUAL CLAIMS  
WITHOUT PREJUDICE**

Judge: Hon. Haywood S. Gilliam, Jr.

Complaint Filed: January 21, 2015  
Am. Complaint Filed: February 20, 2015  
Trial Date: January 6, 2020

1 Plaintiff, Phillip Racies, and Defendant, Quincy Bioscience, LLC, by and through their  
2 undersigned counsel and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil  
3 Procedure, hereby stipulate to Plaintiff's dismissal of his individual claims without prejudice.  
4

5 Dated: May 28, 2020

Respectfully Submitted,

6 BONNETT, FAIRBOURN, FRIEDMAN  
7 & BALINT, P.C.

8 By: /s/ Patricia N. Syverson  
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15 *Attorneys for Plaintiff Phillip Racies*

16 Dated: May 28, 2020

Respectfully submitted,

17 CALL & JENSEN  
18 A Professional Corporation  
Matthew R. Orr  
19 William P. Cole  
Joshua G. Simon

20 By: /s/ Matthew R. Orr  
21 Matthew R. Orr

22 and

23 Geoffrey W. Castello [*Admitted Pro Hac Vice*]  
Glenn T. Graham [*Admitted Pro Hac Vice*]  
24 Kelley Drye & Warren LLP

25 Attorneys for Defendant Quincy Bioscience, LLC  
26  
27  
28

**SIGNATURE CERTIFICATION**

Pursuant to Rule 5-1(i)(3) of the United States District Court for the Northern District of California Local Rules, I hereby certify that the content of this document is acceptable to Matthew R. Orr, counsel for Defendant, and that I have obtained his authorization to affix his electronic signature to this document.

Dated: May 28, 2020

BONNETT, FAIRBOURN, FRIEDMAN &  
BALINT, P.C.

By: /s/ Patricia N. Syverson  
Patricia N. Syverson  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 28, 2020, I electronically filed the foregoing document described as **STIPULATION AND [PROPOSED] ORDER REGARDING VOLUNTARY DISMISSAL OF PLAINTIFF'S INDIVIDUAL CLAIMS WITHOUT PREJUDICE** with the Clerk of the Court using the CM/ECF System, which will send notification of such filing via electronic mail to all counsel of record.

/s/ Patricia N. Syverson  
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